

***Remarks***

Reconsideration of this Application is respectfully requested.

Claims 1-21 are pending in the application, with 1, 16, and 19 being the independent claims. No amendments have been made to the claims at this time.

The Examiner is thanked for the early indication that claims 16-18 are allowed and that claims 8-10 and 12-14 contain allowable subject matter.

Based on the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 102***

Claims 1, 5-6, 7, 11, 15, 19 and 21 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. US 2004/0128696 to Bhaskaran et al. (hereinafter "Bhaskaran"). For the reasons set forth below, Applicant respectfully traverses this rejection.

Independent claim 1 recites:

1. A system comprising:
  - a forward error correction encoder that encodes a first signal to produce a second signal;
  - an interleaver that interleaves the second signal to produce a third signal;
  - a transmission system used to transmit the third signal;
  - a de-interleaver that de-interleaves the third signal and a possible error signal combined with the third signal to produce a fourth signal, such that any burst of the error signals is spread out;*** and
  - a forward error correction decoder that decodes the fourth signal to produce a fifth signal.

*(emphasis added)*

Applicant respectfully submits that nowhere does Bhaskaran teach or suggest "a de-interleaver that de-interleaves the third signal and a possible error signal combined with the third signal to produce a fourth signal, such that any burst of the error signals is spread out" or "de-interleaving the third signal and a possible error signal combined with the third signal to produce a fourth signal" as respectively recited in independent claims 1 and 19.

Page 2 of the Office Action states:

Regarding claim 1, Bhaskaran et al disclose a system comprising: .... a de-interleaver (209) for de-interleaving the third signal and a possible error signal combined with the third signal to produce a fourth signal, such that any burst of the error signals is spread out ....

Bhaskaran recites:

A deinterleaver 209 reverses the interleaving operation of the interleaver 203, and an outer FEC decoder applies the appropriate error correction, scheme matching the FEC encoder 202.

(see Bhaskaran at page 2, paragraph [0034]). However, this does not teach or suggest "a de-interleaver that de-interleaves the third signal and a possible error signal combined with the third signal to produce a fourth signal, such that any burst of the error signals is spread out" or "de-interleaving the third signal and a possible error signal combined with the third signal to produce a fourth signal" as respectively recited in independent claims 1 and 19. If the Examiner continues to use this reference in the future, Applicant respectfully requests the Examiner to specifically point out where Bhaskaran teaches this feature. Accordingly the rejection of claims 1 and 19 under 35 U.S.C. § 102(e) is traversed. Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 5-6, 7, 11 and 15 depend from independent claim 1 and claim 21 depends from independent claim 19, and are patentable over Bhaskaran for at least the same reasons as the independent claims from which they depend, and further in view of their respective features. Accordingly, the rejection of claims 5-6, 7, 11, 15 and 21 under 35 U.S.C. §102(e) is traversed. Reconsideration and withdrawal of the rejection are respectfully requested.

***Rejections under 35 U.S.C. § 103***

**Claims 2-3**

Claims 2-3 were rejected under 35 U.S.C. 103(a) as being unpatentable over Bhaskaran in view of U.S. Publication No. US 2002/0196766 to Hwang et al. (hereinafter "Hwang"). For the reasons set forth below, Applicant respectfully traverses this rejection.

As described above, Bhaskaran does not teach each and every feature of independent claim 1. Hwang fails to supply the teaching missing from Bhaskaran with respect to independent claim 1. Thus, Hwang does not cure the deficiencies noted above for Bhaskaran. Claims 2-3 depend from independent claim 1, and are patentable over Bhaskaran and Hwang for at least the same reason as independent claim 1, and further in view of their own respective features. Reconsideration and withdrawal of the rejection are requested.

**Claims 4 and 20**

Claims 4 and 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Bhaskaran in view of the admitted prior art (hereinafter "APA") (although the Examiner

states claims 4 and 19 are rejected in paragraph 5 of the Office Action, the Examiner alleged claim 20 is rejected in the body of this rejection, so Applicant assumes claims 4 and 20 were meant to be stated in paragraph 5). For the reasons set forth below, Applicant respectfully traverses this rejection.

As described above, Bhaskaran does not teach each and every feature of independent claims 1 and 19. Even assuming the Examiner is correct and that Applicant has made any APA, what the Examiner relies on as APA fails to supply the teaching missing from Bhaskaran with respect to independent claims 1 and 19. Thus, the alleged APA does not cure the deficiencies noted above for Bhaskaran. Claim 4 depends from independent claim 1 and claim 20 depends from independent claim 19, and are patentable over Bhaskaran and the alleged APA for at least the same reason as independent claims 1 and 19, and further in view of their own respective features. Reconsideration and withdrawal of the rejection are requested.

***Allowed subject matter***

Applicants acknowledge the allowance of claims 16-18 with appreciation.

Claims 8-10 and 12-14 were objected to as being dependent upon rejected base claim 1. However, for reasons set forth above, Applicant has traversed the rejection of independent claim 1. Therefore, Applicant respectfully requests that the Examiner reconsider this objection, and that it be withdrawn.

***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

Jason D. Eisenberg  
Attorney for Applicant  
Registration No. 43,447

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1100 New York Avenue, N.W.  
Washington, D.C. 20005-3934  
(202) 371-2600  
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